

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

H. CRISTINA CHEN-OSTER; LISA PARISI;
and SHANNA ORLICH,

Plaintiffs,

vs.

GOLDMAN, SACHS & CO. and THE
GOLDMAN SACHS GROUP, INC.

Defendants.

10-Civ. 6950 (LBS) (JCF)

DECLARATION OF BARBARA
BROWN IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFFS' MOTION TO COMPEL
DISCOVERY OF DATA AND
DOCUMENTS

I, Barbara Berish Brown, hereby affirm under oath that the following is true and correct:

1. I am a partner at Paul Hastings LLP and represent Goldman, Sachs & Co. and The Goldman Sachs Group, Inc. ("Goldman Sachs" or "Defendants") in the above-referenced action. I am admitted *pro hac vice* to this Court. I make this Declaration based on personal knowledge.

2. Attached hereto are true and correct copies of the following documents being provided in support of Defendants' Opposition to Plaintiffs' Motion to Compel Discovery of Data and Documents:

a. Attached as Exhibit 1 is a copy of a letter from Barbara Brown to Magistrate Judge Francis, dated February 29, 2012.

b. Attached as Exhibit 2 is a copy of transcript excerpts from the deposition of Cathy Obradovich, taken on April 18, 2012.

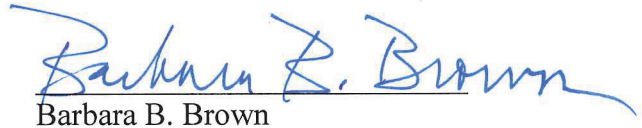
c. Attached as Exhibit 3 is a copy of a letter from Barbara Brown to Magistrate Judge Francis, dated April 3, 2012, attaching Exhibit A (Affidavit of Cathy Obradovich) and Exhibit B (Affidavit of Ankur Pathak).

d. Attached as Exhibit 4 is a copy of the Declaration of Vishali Chandramouli.

e. Attached as Exhibit 5 is a copy of a letter from Geoff Weirich to Adam Klein, counsel for Plaintiffs, dated May 21, 2012.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 30th day of May, 2012.


Barbara B. Brown

28 U.S.C. § 1746